



U.S. Department of Justice

United States Attorney
Southern District of New York

26 Federal Plaza, 37th Floor
New York, New York 10278

September 1, 2025

BY ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, S3 24 Cr. 542 (AS)

Dear Judge Subramanian:

The Government respectfully submits this letter in response to the Court’s July 9, 2025 order directing the parties to provide sentencing data to the Court in advance of the sentencing proceeding in this matter. (Dkt. 451). Specifically, the Court requested that the parties provide “available data on sentences imposed where (1) the primary or sole conviction was for a violation of 18 U.S.C. 2421(a); or (2) the base offense level under the Sentencing Guidelines was calculated under 2G1.1(a)(2) and a Criminal History Category of I.” (*Id.*). The Court further directed the parties to identify cases that “match these criteria . . . by docket number and jurisdiction” and instructed that “no argument should be included in th[e] letter.” (*Id.*). The Government has located several cases that satisfy the criteria identified by the Court, which are listed below.¹

A. Cases Where the Primary or Sole Conviction Was for A Violation of Section 2421(a)

United States v. Felicita Almestica, 11 Cr. 14029 (S.D. Fl.)²

United States v. Timothy William Bavaro, 20 Cr. 115 (E.D.N.C.)

United States v. Mark Daniel Benavidez, 19 Cr. 337 (E.D.N.C.)

¹ After conferrals with the defense regarding a joint letter, defense counsel informed the Government that they would be unable to exchange their case list with the Government in advance of filing and would be submitting their list directly to the Court. Accordingly, the Government is providing its cases in this letter rather than in a joint letter.

² The Government has listed only the case name, docket number, and jurisdiction pursuant to the Court’s order, (Dkt. 451), but can provide additional facts and information regarding these cases upon request.

United States v. Robert Blake, 11 Cr. 183 (E.D.N.Y.)

United States v. Elizabeth P. Castaneda, 97 Cr. 38 (N. Mar. I.)

United States v. Benson Chin, 15 Cr. 730 (S.D.N.Y.)

United States v. Paulette M. Clayton, 17 Cr. 110 (N.D. Miss.)

United States v. Mario D. Collins, 17 Cr. 110 (N.D. Miss.)

United States v. Tory Jamal Collins, 17 Cr. 226 (M.D. Fl.)

United States v. Walter Conwell, 21 Cr. 364 (D. Co.)

United States v. Kaylan Coppage, 22 Cr. 28 (D. Kan.)

United States v. Javier Cortes-Eliosa, 06 Cr. 219 (E.D.N.Y.)

United States v. Kortney Donnell Crews, 19 Cr. 62 (E.D.N.C.)

United States v. Akeem Cruz, 11 Cr. 183 (E.D.N.Y.)

United States v. Jaquan Lee Davis, 15 Cr. 20436 (E.D. Mich.)

United States v. Tyron Davis, 22 Cr. 28 (D. Kan.)

United States v. Samuel Doolittle, 17 Cr. 275 (E.D.N.C.)

United States v. Harry Franklin, 11 Cr. 25 (D. Conn.)

United States v. Deonathan Abdul Gasto, 23 Cr. 1944 (S.D. Cal.)

United States v. Roosevelt McRae Glee, 17 Cr. 217 (M.D. Fl.)

United States v. Christina Green, 16 Cr. 758 (S.D.N.Y.)

United States v. Dakim Gregory, 15 Cr. 189 (E.D.N.C.)

United States v. Daniel Griffin, 20 Cr. 82 (E.D.N.C.)

United States v. Hong Ping He, 15 Cr. 730 (S.D.N.Y.)

United States v. Arcelia Hernandez-Velazquez, 19 Cr. 306 (E.D.N.Y.)

United States v. Jeremy Walton Hibbler, 21 Cr. 191 (W.D. Tex.)

United States v. Kenneth Vernon Hutto, 18 Cr. 7 (M.D. Ga.)

United States v. Maco Jacome-Jacome, 23 Cr. 576 (D.S.C.)

United States v. Nicacio Jaimes-Moreno, 13 Cr. 694 (N.D. Ill.)

United States v. Akiaz Marquez King, 16 Cr. 351 (D. Or.)

United States v. Charles Kizer, 10 Cr. 20385 (W.D. Tenn.)

United States v. Starlett Lehti, 20 Cr. 82 (E.D.N.C.)

United States v. Michael McDonald, 20 Cr. 134 (W.D.N.Y.)

United States v. Carlos Mendoza-Mendez, 15 Cr. 640 (E.D.N.Y.)

United States v. Armondo Osario, 21 Cr. 336 (E.D.N.Y.)

United States v. Rashaun Parks, 19 Cr. 248 (D.D.C.)

United States v. Hassan Portee, 08 Cr. 829 (E.D.N.Y.)

United States v. Derick Price, 07 Cr. 61 (M.D. Penn.)

United States v. Randolph Spain, 14 Cr. 21 (E.D.N.C.)

United States v. Maurice Malik Spencer, 15 Cr. 45 (E.D.N.C.)

United States v. Clifford Stokes Jr., 23 Cr. 258 (S.D. Cal.)

United States v. Kazimierz Sulewski, 06 Cr. 64 (D. Conn.)

United States v. Steven Tanuis, 06 Cr. 64 (D. Conn.)

United States v. Eric Javon Thompson, 16 Cr. 75 (E.D.N.C.)

United States v. Elena Trochtchenkova, 05 Cr. 503 (S.D.N.Y.)

United States v. John Trowbridge, 08 Cr. 74 (W.D.N.Y.)

United States v. Giovanni Vasquez, 11 Cr. 25 (D. Conn.)

United States v. Enrique Tyreek Williams, 19 Cr. 149 (E.D.N.C.)

United States v. Montell Williams, 12 Cr. 144 (N.D. Ind.)

United States v. Tony Obrien Williams, 15 Cr. 107 (E.D.N.C)

United States v. Brandon Wright, 20 Cr. 184 (N.D. Tex.)

United States v. Gui You Wu, 18 Cr. 159 (S.D.N.Y.)

B. Cases Where the Base Offense Level Under the Sentencing Guidelines Was Calculated Under 2G1.1(a)(2) and a Criminal History Category of I

United States v. Mark Brener, 08 Cr. 533 (S.D.N.Y.)*³

United States v. Hazel Marie Sanchez Cerdas, 19 Cr. 65 (E.D. Va.)*

United States v. Eun Sook Chang, 10 Cr. 878 (S.D.N.Y.)

United States v. Benson Chin, 15 Cr. 730 (S.D.N.Y.)

United States v. Mario D. Collins, 17 Cr. 110 (N.D. Miss.)

United States v. Brittany Danielle Cromer, 22 Cr. 726 (D.S.C.)

United States v. Jeffrey N. English, 11 Cr. 286 (N.D. Ohio)

United States v. Aihua Gong, 16 Cr. 460 (S.D.N.Y.)

United States v. Jian Zhong Gu, 16 Cr. 460 (S.D.N.Y.)

United States v. Hong Ping He, 15 Cr. 730 (S.D.N.Y.)

United States v. Jeremy Walton Hibbler, 21 Cr. 191 (W.D. Tex.)*

United States v. Dillon Jordan, 21 Cr. 423 (S.D.N.Y.)

United States v. Armondo Osario, 21 Cr. 336 (E.D.N.Y.)

United States v. Michael Stebick, 08 Cr. 206 (W.D.N.Y.)

United States v. Steven Tanuis, 06 Cr. 64 (D. Conn.)

United States v. Ronald H. Tills, 08 Cr. 242 (W.D.N.Y.)

³ An asterisk denotes cases that appear, based on context, to apply U.S.S.G. § 2G1.1, but the Government was unable to confirm the applicable Guideline through publicly available documents.

United States v. John Trowbridge, 08 Cr. 74 (W.D.N.Y.)

United States v. Gui You Wu, 18 Cr. 159 (S.D.N.Y.)

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: _____/s

Meredith Foster
Emily A. Johnson
Christy Slavik
Madison Reddick Smyser
Mitzi Steiner
Assistant United States Attorneys
(212) 637-2310/-2409/-1113/-2381/-2284